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Attorneys for Defendant
TWIN CITY FIRE INSURANCE COMPANY

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNIFIED WESTERN GROCERS,)	CIVIL NO. CV 03-00336 HG BMK
INC.; CERTIFIED GROCERS OF)	
CALIFORNIA, LTD.; GROCERS)	JOINT STIPULATION AND
SPECIALTY COMPANY; ALFRED)	ORDER TO CONTINUE EXPERT
A. PLAMANN; CHARLES)	DISCLOSURE AND REPORT
PILLITER; DANIEL T. BANE;)	EXCHANGE DEADLINES

ROBERT M. LING; AND DAVID A.)	
WOODWARD,)	
)	
Plaintiffs,)	
)	Trial Date: November 6, 2007
vs.)	
)	
TWIN CITY FIRE INSURANCE)	
COMPANY, an Indiana Corporation,)	
)	
Defendant.)	
_____)	

1. WHEREAS an Amended Scheduling Order was entered in this action on or about January 8, 2007, by the Honorable Magistrate Barry M. Kurren;

2. WHEREAS the Amended Scheduling Order sets this matter for trial on November 6, 2007, before the Honorable Presiding Judge Helen Gillmor;

3. WHEREAS the parties have been diligently engaging in discovery in preparation for trial;

4. WHEREAS Twin City Fire Insurance Company ("Twin City") has propounded extensive written discovery to each Plaintiff in this action;

5. WHEREAS Plaintiffs' counsel has advised Twin City's counsel that Plaintiffs need additional time beyond that provided for by statute to provide responses to Twin City's written discovery and to prepare documents for inspection and copying by Twin City;

6. WHEREAS Plaintiffs' counsel requested a two (2) week extension to respond to Twin City's written discovery;

7. WHEREAS, in light of certain impending deadlines imposed by the Amended Scheduling Order, TWIN CITY agreed to grant Plaintiffs' request for a two (2) week discovery extension in exchange for Plaintiffs' agreement to extend the deadlines for expert disclosure and the production of expert reports (the "Expert Deadlines") so as to allow Twin City sufficient time to obtain Plaintiffs' discovery responses, review the documents produced by Plaintiffs, and take depositions before the Expert Deadlines;

8. WHEREAS Plaintiffs discovery responses which were due on April 2, 2007, are now due on April 16, 2007, by extension;

9. WHEREAS Plaintiffs' counsel has agreed to stipulate to extend the Expert Deadlines by no less than four (4) to six (6) weeks subject to this Honorable Court's approval and further Order;

9. WHEREAS the current deadline for the disclosure of experts and exchange of expert reports is as follows:

- a. Plaintiffs shall comply by May 7, 2007;
- b. Defendant shall comply by June 6, 2007;

10. WHEREAS the parties mutually agree and wish to continue the deadline for the disclosure of the identity of each expert who may be used at trial to present expert evidence and the exchange of expert reports according to the following schedule:

- a. Plaintiffs shall comply by June 18, 2007;
- b. Defendant shall comply by July 18, 2007;

IT IS HEREBY STIPULATED by and between the Parties hereto, through their respective counsel, that expert disclosure and the exchange of expert reports be continued from May 7 until June 18, 2007 (for Plaintiffs), and from June 6 until July 18, 2007 (for Defendant).

DATED: Honolulu, Hawaii March 30, 2007

/s/ Jon H. Steiner
JON H. STEINER
CHRISTOPHER COLE
McCorriston Miller Mukai MacKinnon LLP
Attorneys for Plaintiffs

DATED: Los Angeles, California March 29, 2007

/s/ Samantha Ball
KIM W. WEST
SAMANTHA M. BALL
Tucker Ellis & West LLP
Attorneys for Defendant TWIN CITY FIRE
INSURANCE COMPANY

DATED: Honolulu, Hawaii March 30, 2007

/s/ Sheree Kon-Herrera
WESLEY H. H. CHING
SHEREE KON-HERRERA
Fukunaga Matayoshi Hershey & Ching LLP
Attorneys for Defendant TWIN CITY FIRE
INSURANCE COMPANY

APPROVED AND SO ORDERED.



/s/ Barry M. Kurren
United States Magistrate Judge
Dated: April 10, 2007

Unified Western Grocers, Inc., et al. v. Twin City Fire Insurance Company, Civil
No. CV 03-00336 HG BMK, JOINT STIPULATION AND [PROPOSED]
ORDER TO CONTINUE EXPERT DISCLOSURE AND REPORT EXCHANGE
DEADLINES